

EXHIBIT A

Supreme Court of Pennsylvania

2022-C-2095 /s/KF

Court of Common Pleas
Civil Cover Sheet

Lehigh

County

For Prothonotary Use Only:

Docket No:

FILED STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

- ☐ Complaint
 ☐ Writ of Summons
 ☐ Petition
 ☐ Declaration of Taking

Lead Plaintiff's Name: GODS CHURCH OF MIRACLES
REPRESENTED BY REVEREND JAMES E. ROSE, JR.

Lead Defendant's Name: ANDY WRIGHT, "OWNER"

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits
(check one) ☒ outside arbitration limitsIs this a Class Action Suit? ☐ Yes ☒ NoIs this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: _____

☒ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☒ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other: _____

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other _____
☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other _____
☐ Other: _____

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other _____
☐ Zoning Board
☐ Other: _____

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other: _____

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other: _____

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other: _____

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional: _____

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IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION

GODS CHURCH OF MIRACLES
REPRESENTED BY REVEREND JAMES E.
ROSE, JR.

Plaintiff

vs.

ANDY WRIGHT, " OWNER " ;
VINART DEALERSHIPS, ET AL

Defendant

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: File No.
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NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LEHIGH COUNTY BAR ASSOCIATION
LAWYER REFERRAL SERVICE
P.O. BOX 1324
ALLENTOWN, PENNSYLVANIA 18105
TELEPHONE: 610-433-7094

/s/ Reverend James E. Rose, Jr.
for Gods Church of Miracles

Signature

Reverend James E. Rose, Jr. for Gods Church of Miracles

(Name)

911 Barnsdale Rd, Allentown, PA 18103

(Address)

(610) 737 - 8434

(Telephone Number)

IN THE COURT OF COMMON PLEAS
LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION

GODS CHURCH OF MIRACLES
REPRESENTED BY REVEREND JAMES E. ROSE, JR.
PLAINTIFF

NO: _____
JURY TRIAL DEMANDED

V

ANDY WRIGHT, "OWNER";
VINART DEALERSHIPS, ET AL
DEFENDANTS

COMPLAINT

PARTIES

1. Plaintiff, Gods Church of Miracles, is represented by Reverend James E. Rose, Jr. and has a principal place of business of 911 Barnsdale Rd, Allentown, PA 18103.
2. Defendant, Andy Wright, "Owner", is a natural person and owner of Defendant VinArt Dealerships and has a principal place of business located at 675 State Avenue, Emmaus, PA 18049.
3. Defendant, VinArt Dealerships, is a corporation with principal place of business located at 675 State Avenue, Emmaus, PA 18049.

BRIEF HISTORY AND OUTLINE OF FACTS

4. Plaintiff purchased a vehicle from Defendants at the dealership called Lehigh Valley Acura. Said vehicle was a 2016 Mercedes and was believed by the Plaintiff to be in perfect working order, so Reverend Rose was told by Defendants' manager, Eoin Walshe. Mr. Walshe also made these statements to Mr. Marcus A. Henry, Jr.
5. Plaintiff initially took a Lexus belonging to Gods Church of Miracles to Lehigh Valley Honda for an oil change. What Plaintiff discovered was that Defendant really does not change the oil, they just say they change the oil.
6. Defendants' workers stated they changed the oil. Three months later, Plaintiff took the car back and was told the oil was changed again. The technician stated Plaintiff put 6000 miles on the car in 3

months; this was untrue. What the technician was looking at were the trip miles not the miles since the last oil change; the miles the car was driven since the Plaintiff, Gods Church of Miracles, purchased the car. What the technician was reading was that Plaintiff put 6000 miles on the car since the car was purchased.

7. Defendants did not charge Plaintiff to change the oil because, Plaintiff waited multiple hours.

8. What Plaintiff noticed is there was no sticker on the windshield, the first time nor the second time.

9. Plaintiff then was driving the car around and then the engine light came on saying the oil needed to be changed. The oil was just changed a week prior to the light coming on. This is when Plaintiff knew that Defendant was hustling customers.

10. If the Defendants did this to the Plaintiff, how many other people was this done to?

11. Defendant claims he has videotapes of all oil changes. Plaintiff needs to see a copy of these videos because, Plaintiff has the oil that was taken from the car after 3 weeks. The oil is pitch black. Plaintiff will bring an oil expert who will testify to this Court that the oil was never changed like the Defendant stated it was.

12. Plaintiff notified Defendant Wright by letter telling him of the fake oil change. This is when Defendant decided to have an anger meltdown. See **EXHIBIT "A"** attached hereto.

13. Here the Defendant is threatening the Plaintiff that if Plaintiff ever comes anywhere near the property, he will have the Plaintiff arrested, but he never described anywhere in his letter what the Plaintiff did to be arrested.

14. Defendant is married to a woman of Color, a Puerto Rican woman allegedly. Plaintiff believes that the Defendant Wright hates people of Color because of the control his wife may have over him: she is a woman of Color who have a tendency to dominate White men. This is what Puerto Rican women say; Plaintiff does not know.

15. Plaintiff believes that Defendant has hostility toward men of Color due to the fact that Defendant has mistreated the Plaintiff for no valid reason.

16. Plaintiff simply informed the Defendant on activity that is perhaps illegal taking place at his garage. Defendant had an adverse reaction and then in black & white told the Plaintiff that if he ever tried to come around Defendant's property, he would be arrested.

17. This type of threat is the practice of **Jim Crow**. You can't have people arrested or disrupt the Right to Travel simply because you hate people of Color. Apparently, Defendant is mad at people of Color due to the fact that he married a woman of Color.

18. Plaintiff will take the deposition of the Defendant and his wife to find out why the Defendant has such hostility toward people of Color, and the Defendant's wife is certainly a woman of Color. It could very much shed some light on the Defendant's state of mind and attitude toward people of Color.

19. Defendant clearly in black and white in his letter to the Plaintiff echoed the White Racist cry when White Racists would post a sign at the edge of town saying, "[N-word], be out of town by sundown." This is exactly what the Defendant has proposed to the Plaintiff.

20. Plaintiff simply tried to tell the Defendant that the Plaintiff was taken advantage of by his workers.

21. The Plaintiff then tried to get the Defendant to fix a Mercedes that was purchased by Marcus Henry for Gods Church of Miracles as a gift.

22. Defendants' own mechanics told the Plaintiff that the Mercedes needed to have a tune up; however, Defendant told Reverend James Rose that he should not get the tune up but wait until the car has 5000 miles on it.

23. Reverend Rose who was representing Plaintiff, Gods Church of Miracles, at that time knew that this was a con game, and he also knew that the Defendant was abusing the Plaintiff.

24. Plaintiff demands that Defendant Wright and VinArt produce all the records of the repairs done on the vehicle for Gods Church of Miracles.

25. Plaintiff, Gods Church of Miracles, through Reverend James E. Rose, Jr. told the Defendant this matter can be squared up if Defendant gave Gods Church of Miracles half its money back. Since Defendant never responded to that offer, Plaintiff Gods Church of Miracles now demands Defendants give Gods Church of Miracles the value of the car plus \$75,000 for pain and suffering.

26. Defendant was offered every opportunity to resolve this matter, and now the Defendant must stand trial so a Jury can determine the issues of fact.

27. Defendant is of the impression that he can push people of Color around, the same way he apparently pushes his wife of Color around. The only way the Plaintiff can get to the truth of this matter is taking the deposition of Defendant Wright and then his wife.

28. It appears Defendant Wright thinks he is part of the Italian Mafia.

29. Defendant acts very radical like he is a member of the Proud Boys or Oathkeepers. Yes, in some of Defendant's tone, he sounds like a member of the KKK.

30. Defendant threatened Reverend Rose to have Reverend Rose arrested. This threat is in black and white which is attached hereto. Clearly, this threat impedes Reverend Rose's Right to Travel as a Black man.

31. Plaintiff Reverend Rose believes that the Constitution under the 14th Amendment guarantees him the Right to move freely in the United States of America; however, through Defendant's own letter, he clearly states what he is going to do to the Black Reverend Rose if he gets caught anywhere near Defendants' property.

32. This has placed a chilling effect in the mind of Reverend Rose who is now terrified of the Defendant and has been restricted of travelling down Lehigh Street for fear that the Defendants will call the police on the Plaintiff.

33. As this Court knows, the Right to Travel is well embedded in the 14th Amendment. Defendant in his threatening letter clearly states that the Plaintiffs do not have the Right to Freedom of Travel especially around any of Defendants' business which serve the public. As this Court knows, the side walk is a public sidewalk, clearly the letter of threat by the Defendant places a chilling effect on the Constitution of the United States.

34. This is what Reverend Rose proposes on behalf of Gods Church of Miracles: Pay Gods Church of Miracles \$100,000, and this matter can be settled without any further litigation. Any proposal short of this will lead immediately to a trial before a Jury of Plaintiff's peers.

35. What the Defendant did is he cursed God when he cursed Gods Church of Miracles. If the Defendants are not familiar with the Plaintiff Reverend Rose, this matter will also be taken up in the United States District Court for Federal Civil Rights violations.

36. Plaintiff also reminds this Honorable Court that the Plaintiff has the option of taking the Defendant before the Human relations Commission.

37. The Defendant will be tied up for months, if not years. Each time the Plaintiff gets information on the Defendant Wright, the Plaintiff will want to take the deposition of Defendant Wright.

38. Defendant is going to end up in Federal Court for Federal Civil Rights Violations which are in black and white in **EXHIBIT "A"**. Here a White man is threatening a man of the Cloth who happens to be Black.

39. Clearly, **EXHIBIT "A"** states that a Black man would be arrested if he is anywhere near the property of a White man. This statement clearly shows that the Defendant has a tremendous dislike for people of Color because, the Constitution is so clear when it comes to a Black person's Right to Travel.

40. The Plaintiff has tried to settle this case with the Defendant and the Defendant basically thumbed his nose to the Plaintiff. The Defendant believes that he possesses White Power, which he probably does. This is the same type of attitude that White Racists had when they attacked the White House on January 6, 2021.

41. Defendant does not realize that Black people have a Right to have Freedom of Movement and that the Plaintiff represents the Lord, Jesus Christ, and many Black parishioners who have voting power. Plaintiffs, Gods Church of Miracles, have a right to be free from religious persecution.

42. Defendant believes that he is above the law, and in **EXHIBIT "A"** it clearly demonstrates that the Defendant has little or no regard for people of Color, and in that, Gods Church of Miracles is protected by the 1st and 14th Amendments.

43. Gods Church of Miracles cannot be restricted, and clearly, from **EXHIBIT "A"** Defendant is telling the whole World what he will do to a man of Color who represents the Lord, Jesus Christ.

44. The late Reverend Dr. Martin Luther King, Jr. addressed this same issue when he stated, "Injustice anywhere is a Threat to Justice Everywhere". Defendant used such language as to make Reverend Rose in fear for his safety and in fear for his life because, the Defendant appears to be ruthless in his description of what he will do to a man of Color.

45. Defendant cannot say he did not state it, it is his signature. Clearly, the Defendant has little or no regard for the Constitution nor Civil Rights and Liberties of persons of Color and more importantly a Church of God.

46. Defendant knew at all times what he was doing, and when Plaintiff, Gods Church of Miracles, takes his deposition, it will be found what Satanic God Defendant is worshipping because, you just do not threaten a man of the cloth nor the Church of God.

47. Defendants should know that Allentown is part of the Bible belt. This is why this matter must go to Trial so that Christian Jury members can see how people such as the Defendant, the Anti-Christ, treats God's Children.

48. The question before this Court is how many other people were cheated with the oil change, and if the oil were changed, there would have been a sticker put on the car, but each time the automobile was taken to the garage, the Defendants did not put a sticker on the car stating the oil was changed.

49. The only way this case can be resolved is if the Defendant gives Gods Church of Miracles \$100,000 so that Gods Church of Miracles can move forward and get the automobile fixed. If not, the Defendants have to stand trial. **EXHIBIT "A"** shows Defendant's state of mind and the Defendant's intentions which echo the practice of the Mason-Dixon line and is a direct threat without cause.

50. No good White man would veer threaten a man of Color and a man of the cloth simply because he has a lot of money. What did Jesus say? "It is easier for a camel to go through the eye of a needle than it is for a rich man to enter the Kingdom of Heaven."

51. Apparently, this Defendant is an Anti-Christ and believes that he can be protected by the Court. When the Court must uphold Civil Rights and condemn the practice of White Supremacy.

52. Plaintiff's representative, Reverend Rose, has over 200 friends who have podcasts. Reverend Rose will have all his friends expose the Defendant for his dirty deeds. The Court cannot by law protect a White Supremacist who is so brazen that he put in black and white he would get a Black man by any means necessary. That is what the Defendant said.

53. **There are no Preliminary Objections on the planet Earth that could cure this catastrophe and this Devil worship.** This Court should be fully aware that the Devil wears many hats, and by the Defendant's own admission, he clearly represents and follows in the footsteps of the Devil.

54. No decent White businessman would ever threaten a man of Color unless that White businessman is a White Supremacist and a Devil worshipper himself. What decent White businessman would condemn and try to crucify a Black reverend for worshipping the Lord? i.e. The Defendant does not have a problem showing this Court his true colors.

55. Defendant can file through his lawyer all the Preliminary Objections he wants, but this matter boils down to a trier of fact, and this Court cannot do a favor for the Defendant by ignoring the law and the evidence before this Honorable Court.

56. Perhaps this Honorable Court is being "pleasurized" with the hope and intention that the Defendant relies upon the Court being, itself, supportive of White Supremacy, White Racism, and terroristic threats.

57. Plaintiff will notify all his podcast associates to tell the World not to buy any more cars at the Defendants' car lots. This podcast will go around the World, and the Plaintiff believes that the Defendants' sales will drop by 75% in the next year because, he will be exposed for this treacherous threats; not only toward a man of Color, but to the Lord, Jesus Christ, himself.

58. It would be advantageous for the Defendant to settle this case.

59. The Court cannot be the fixer and allow Defendants' lawyer to file Preliminary Objections when this matter belongs to the trier of fact before a Jury because, **EXHIBIT "A"** speaks to the evil intentions of the Defendants.

60. \$100,000 is a very reasonable settlement offer. If the Court takes notice, Reverend Rose did not ask for any money, and he could and he should ask for \$100,000 for himself as well because, Reverend Rose was threatened the same way that people of Color were threatened by KKK members for the past 150 years.

61. The Court must be mindful that Defendant quoted the criminal statutes because, he apparently had a meeting of the minds with his lawyer or perhaps some other White Supremacists.

62. Plaintiff refused to settle for any less than \$100,000. Either that or go to trial and see what a Just has to say.

63. In a phone conversation, the Defendant stated that his lawyers have great connections among the Lehigh County Court Judges. This is a travesty because, Defendant with or without his attorneys is not going to fix this case nor rig this case.

64. This is why it is so imperative that we have a trial by Jury so the public can see how White Supremacy works in Allentown, PA.

65. The actions of the Defendant reminds Reverend Rose of a nursery rhyme that White people use sing to the Plaintiff when he was a child, and it goes like this, "eenie, meenie, minie, moe. Catch a [N-word] by his toe. If he hollers, let him go." That is exactly the theme song of the Defendant.

66. **EXHIBIT "A"** clearly says, "N-word, N-word, N-word, N-word, N-word." Plaintiff simply wants the Defendant to settle the case to save the Defendant ridicule and embarrassment.

67. Clearly, Reverend Rose has to be compensated for the threats unless the Defendants want a Jury to make the determination as to damages. A trial will prove to be extremely, extremely embarrassing for these Defendants because, the Plaintiff knows things that the Defendants do not want made public. It would prove to be the highest form of embarrassment that this Defendant could experience.

68. The Defendant knows that he is not a stupid man and that his place of business is a public place, and you cannot bar people of Color nor a man of God from entering a public place. That is simply impossible, but only true in the mind of a White Supremacist and White Racist. Clearly **EXHIBIT "A"** identifies what the Defendant really is.

69. This is why the Defendants' depositions must be taken immediately so that Defendants can explain White Racist motivation. Defendant Wright's wife is clearly vital to any Defense that the Defendant may want to argue to establish that he is no White Supremacist.

70. Currently, the automobile's right front tire blew up on Reverend Rose when he was driving the automobile to Court in Bucks County. A replacement tire had to be put onto the car because, the tire sold to the Plaintiff, was no good.

71. The automobile needs a tune-up. It needs front-end alignment work. It needs brakes. The automobile is a trainwreck. It was sold to the Plaintiff with torn seats. The automobile pulls to the right and goes all over the road like it is on steroids.

72. There is a nut and bolt that holds the side panel up: that is coming apart. Defendant through his lackey Eoin refuses repair the automobile.

73. Defendants are used to treating people of Color like they are dogs. Plaintiff will subpoena all the records of the Plaintiffs to see how many people were mistreated by the company. It is absolutely advantageous that the Defendants pay the Plaintiff \$100,000 in order to avoid public ridicule and embarrassment if not, lets go to trial as soon as possible, so that thus slip-shod operation will be exposed to the public at large.

74. The car is a piece of junk, and it is going to take a great deal of money to get the car back to good operating conditions.

WHEREFORE, Plaintiff seeks \$100,000 punitive and \$100,000 nominal damages from the Defendants. Defendants may settle the case out of Court for \$100,000. If not, let's have a trial by Jury and let a Jury determine how much the Defendant really owes to Gods Church of Miracles and Reverend Rose.

September 24, 2022

Respectfully Submitted,

/s/ Reverend James E. Rose, Jr.

for Gods Church of Miracles

Gods Church of Miracles Represented by
Reverend James E. Rose, Jr.



September 1, 2022

Mr. Jimi Rose
911 Barnsdale Road
Allentown, PA 18103

Re: Notice Under Pennsylvania Crimes Code – Section 3503(b)(1)(i)

Dear Mr. Rose:

After receiving your two latest correspondences in August and your repeated telephone calls, I am providing you with this Written Notice that you are no longer permitted to enter any of the Vinart organization properties. That includes Acura, Honda, Hyundai, Mercedes and Porsche stores as well as the used car lot and the collision center.

This is your actual communication pursuant to Section 3503(b)(1)(i) of the Pennsylvania Crimes Code. In the event you are on any of the above-mentioned properties, you will be charged by the police as a defiant trespasser which is a Misdemeanor 3 under the Crimes Code.

If you have a question concerning any warranty work on your 2016 E350 Mercedes, call Eoin Walshe and he can inform you what steps you can take to have the warranty work performed at a different entity.

You appear to misconstrue most of the statements I make to you. Therefore, the within Notice is very simple. Do not call the dealerships nor go on to any of the properties for any reason other than to speak on the phone with Eoin Walsh concerning warranty work.

We do not wish to service any of your vehicles nor sell any vehicle to you in the future. It is my understanding that you do not own either of the vehicles. The Mercedes is owned by a Marcus Henry, Jr. and the Lexus is owned by God's Church of Miracles.

Sincerely,

VINART DEALERSHIPS

Andrew W. Wright
Managing Partner



7030 151N



Mercedes-Benz



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IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL/FAMILY COURT DIVISION

Gods Church of Miracles) NO. 2022-C-2095
James E Rose Jr) Plaintiff)
vs)
Andy Wright) ASSIGNED JUDGE:
Defendant)

ORDER OF COURT

AND NOW, this 28th day of Sept. 2022, upon
consideration of the Petition to Proceed in *Forma Pauperis* filed pursuant to Pa. R.C.P. Rule
240, it is **ORDERED** that Petitioner, Gods Church of Miracles and James E Rose Jr, is:

✓ **GRANTED** permission to proceed in *forma pauperis*, the court having found that
Petitioner is without financial resources to pay the costs of litigation.

**Petitioner has a continuing obligation to inform the court of improvement in the
Petitioner's financial circumstances which will enable the Petitioner to pay costs.**

For custody actions, as applicable, Petitioner is directed to e-file a blank Scheduling
Order for custody conference in accordance with Pa.R.C.P. 1915.4 et al.

IT IS FURTHER ORDERED, that if the Scheduling Order is not e-filed within 20 days,
the pleading shall be dismissed, and if applicable, the case discontinued.

_____ **DENIED** permission to proceed in *forma pauperis*, the court having found that Petitioner
has financial resources to pay the costs of litigation.

Petitioner shall pay the filing fee as set forth in the Billing Invoice from Clerk of Judicial
Records, or the pleading will be dismissed pursuant to Pa.R.C.P. 240(c)(1)(ii).

For custody actions, as applicable, upon payment of the required filing fee, Petitioner is
directed to take a copy of payment receipt to Family Court Administration, Room 423, to
obtain a Scheduling Order for custody conference in accordance with Pa.R.C.P. 1915.4
et al.

IT IS FURTHER ORDERED, that if the Scheduling Order is not e-filed within 20 days,
the pleading shall be dismissed, and if applicable, the case discontinued.

_____ The underlying pleading/action is **DISMISSED** pursuant to Pa. R.C.P. 240(j)(1), after a
finding that the allegation is untrue or the proceeding is frivolous

BY THE COURT:

TE Cattrey J.

IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION

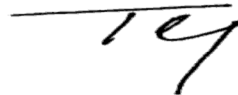
Gods Church of Miracles	:	NO: 2022-C-2095
Plaintiff	:	
	:	ASSIGNED TO:
v.	:	
	:	JUDGE THOMAS M. CAFFREY
Andy Wright Vinart Dealerships	:	
Defendant	:	

ORDER¹

AND NOW, this 13th day of October, 2022, it is **ORDERED** that:

1. A Status Conference with Judge Thomas M. Caffrey is scheduled for December 16, 2022 at 3:30 PM. The Status Conference will be a video conference held via the Zoom Video Conference application. Self-represented parties and counsel are responsible for accessing the video conference using the following information: **Meeting ID 84118422201; Password 123456**. The Court will manage the video conference and permit self-represented parties and counsel to join the video conference as the work of the Court permits.
2. At least five days prior to the Status Conference, self-represented parties and counsel shall electronically file with the Clerk of Judicial Records a Status Conference Memorandum that shall not exceed three pages and shall include the following information:
 - a) Concise statement of facts.
 - b) Legal causes of action.
 - c) The relief that you seek.
 - d) Status of Settlement Negotiations.
3. A request for a continuance shall be submitted by use of the "Application for Continuance" form available online at www.lccpa.org. (under General Civil Court Forms). The form must be fully completed and contain the signatures of all counsel and self-represented parties, and may be e-filed or faxed to 610-871-2794.

BY THE COURT:



Thomas M. Caffrey

J. /dmd

¹ The Parties are directed to consult, and familiarize themselves with, Judge Thomas M. Caffrey's Policies and Procedures in Civil Cases, which can be found at www.lccpa.org.

IN THE COURT OF COMMON PLEAS
LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION

GODS CHURCH OF MIRACLES
REPRESENTED BY REVEREND JAMES E. ROSE, JR.
PLAINTIFF

NO: 2022-C-2095

V

ANDY WRIGHT, "OWNER";
VINART DEALERSHIPS, ET AL
DEFENDANTS

RESPONSE TO ENTRY OF APPEARANCE AND DEMAND FOR JURY TRIAL OF R. ANTHONY
MICHETTI

1. Plaintiff thanks Opposing Counsel for demanding that there be immediate trial.
2. Plaintiff will demand that Defendants produce all oil change record of all the customers for the past 3 years, and also the records of all the customers they sold cars to from VinArt Dealership, Mercedes Dealership, and Acura Dealership for the purpose of finding out if there is a pattern of selling cars that are not honored by the dealership. The only way to have this information is through discovery.
3. A trial in this matter would be extremely beneficial to the public as well as the Attorney General's Office as well as the U.S. Department of Justice in which a Black man was threatened that if he comes on the property of a White man he would be arrested for just showing up. That is a Civil Rights violation and would be a different lawsuit in U.S. District Court.
4. Because the Defendants did make these Civil Rights violations in writing and as such a new complaint will be filed in the U.S. District Court because, the Plaintiff's Civil Rights and Liberties were violated.
5. Plaintiff would also like to clarify that Defendant's wife is from Chile and not Puerto Rico. In that, Defendant's wife will be a material witness as she is a woman of Color and can testify as to the character of the Defendant Wright toward people of Color.



LEHIGH COUNTY SHERIFF'S OFFICE
455 Hamilton St. Room 253
Allentown, PA 18101
JOSEPH N. HANNA
SHERIFF



SHERIFF'S RETURN OF SERVICE

GODS CHURCH OF MIRACLES, ET AL
- VS -
ANDY WRIGHT

Case Number
2022-C-2095

10/13/2022 11:03 AM I hereby CERTIFY and RETURN that on October 13, 2022 at 11:03 AM at 675 State Avenue Emmaus PA 18049 the within COMPLAINT, was served on Vinart Dealerships, the Defendant named therein, in the following manner:

By delivering to and leaving with Arvind Patel the Sales Manager to the Defendant a true copy thereof, a person over the age of eighteen.

NOTES:

SHERIFF COST: \$0.00

So Answers,

A handwritten signature in black ink, appearing to read "Jon Gunshore".

Deputy Sheriff Jonathan Gunshore

Sheriff of Lehigh County

A handwritten signature in black ink, appearing to read "Joseph N. Hanna".

Filed 10/17/2022 15:56:57 , Clerk of Judicial Records, Civil Division, Lehigh County, PA



LEHIGH COUNTY SHERIFF'S OFFICE
455 Hamilton St. Room 253
Allentown, PA 18101
JOSEPH N. HANNA
SHERIFF



SHERIFF'S RETURN OF SERVICE

GODS CHURCH OF MIRACLES, ET AL
- VS -
ANDY WRIGHT

Case Number
2022-C-2095

10/13/2022 11:03 AM I hereby CERTIFY and RETURN that on October 13, 2022 at 11:03 AM at 675 State Avenue Emmaus PA 18049 the within COMPLAINT, was served on Andy Wright, the Defendant named therein, in the following manner:

By delivering to and leaving with Arvind Patel the Sales Manager to the Defendant a true copy thereof, a person over the age of eighteen.

NOTES:

SHERIFF COST: \$0.00

So Answers,

A handwritten signature in black ink, appearing to read "Jon Gun", followed by a horizontal line.

Deputy Sheriff Jonathan Gunshore

Sheriff of Lehigh County

A handwritten signature in black ink, appearing to read "Joseph N. Hanna", followed by a horizontal line.

EXHIBIT B



SUSANIN WIDMAN & BRENNAN, PC
COUNSELLORS AT LAW

NICHOLAS F. HLYWIAK
nhlywiak@swbcounselors.com

October 28, 2022

Rev. James E. Rose, Jr.
God's Church of Miracles
911 Barnesdale Road
Allentown, PA 18103

**Re: God's Church of Miracles, et al. v. Andy Wright and Vinart Dealerships;
Leigh County CCP File No. 2022-C-2095**

Dear Rev. Rose:

This firm represents Andy Wright and Vinart Dealerships, the Defendants in the above-referenced case. Please be advised that Defendants have filed a Notice of Removal with the U.S. District Court for the Eastern District of Pennsylvania ("EDPA") to remove this case from the Lehigh County Court of Common Pleas to the EDPA.

I am enclosing a copy of the Defendants' Notice of Removal which was filed in the EDPA today. I am also enclosing a copy of Defendants' Notice of Filing of Notice of Removal, which was filed with the Lehigh County Court of Common Pleas today.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nick Hlywiak".

Nicholas F. Hlywiak

Enclosures

EXHIBIT C

**IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION**

God's Church of Miracles :
Represented by Rev. James E. Rose, Jr. :
911 Barnsdale Road :
Allentown, PA 18103 :

Plaintiffs,

v.

Andy Wright :
675 State Avenue :
Emmaus, PA 18049, :
Vinart Dealerships :
675 State Avenue :
Emmaus, PA 18049 :

Defendants.

File No. 2022-C-2095

DEFENDANTS' NOTICE OF FILING OF NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT on October 28, 2022, Defendants in the above-caption action, by and through their undersigned counsel, removed this action to the United States District Court for the Eastern District of Pennsylvania, by filing a Notice of Removal in that Court. A copy of the Notice of Removal is attached hereto as **Exhibit A**. Accordingly, and pursuant to 28 U.S.C. § 1446(d), this Court may proceed no further unless and until the case is remanded.

Respectfully submitted,



October 28, 2022

By: _____
Nicholas F. Hlywiak
Brian W. Waerig
Susanin Widman & Brennan, P.C.
1001 Old Cassatt Rd., Suite 306
Berwyn, PA 19312
(610) 710-4510

nhlywiak@swbcounsellors.com
bwaerig@swbcounsellors.com
Attorney for Defendants

By: /s/ R. Anthony Michetti
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Attorney for Defendants